

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION**

CHRISTOPHER AMRINE, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

J.J.F. MANAGEMENT SERVICES, INC.
d/b/a FITZGERALD AUTO MALLS,

Defendant.

Case No.: 8:25-cv-1377-PX

ALEX NORWOOD, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

J.J.F. MANAGEMENT SERVICES, INC.
d/b/a FITZGERALD AUTO MALLS,

Defendant.

Case No. 8:25-cv-1399-PX

KIPEN HENRY, on behalf of himself and
on behalf of all other similarly situated
individuals,

Plaintiff,

v.

J.J.F. MANAGEMENT SERVICES, INC.
d/b/a FITZGERALD AUTO MALLS,

Defendant.

Case No. 8:25-cv-1448

NOTICE OF RELATED CASES

PLEASE TAKE NOTICE that Plaintiffs Christopher Amrine, Alex Norwood, and Kipen Henry (collectively, “Plaintiffs”) filed a *Motion to Consolidate and Appoint Interim Leadership Counsel* on May 6, 2025 (“Motion”), requesting that the Court consolidate the above-captioned matters pursuant to Federal Rule of Civil Procedure (“Rule”) 42(a) and appoint Nicholas A. Migliaccio of Migliaccio & Rathod LLP, Cassandra P. Miller of Strauss Borrelli PLLC, and Kennedy M. Brian of Federman & Sherwood as Interim Co-Lead Class Counsel pursuant to Rule 23(g)(3). Since filing the Motion, three (3) related matters have been filed that arise out of the same set of facts and assert overlapping claims for relief on behalf of similar putative classes:

1. *Kelly Frolo v. J.J.F. Management Services, Inc. d/b/a Fitzgerald Auto Malls*, No. 8:25-cv-01474 (D. Md.);
2. *Lamb v. J.J.F. Management Services, Inc. d/b/a Fitzgerald Auto Malls*, No. 8:25-cv-01508 (D. Md.); and
3. *Arnold Abraham v. J.J.F. Management Services, Inc. d/b/a Fitzgerald Auto Malls*, No. 8:25-cv-01892 (D. Md.).

For the same reasons set forth in the Motion, Plaintiffs respectfully request consolidation of the above-captioned matters into the first-filed case—*Amrine v. J.J.F. Management Services, Inc. d/b/a Fitzgerald Auto Malls*, No. 8:25-cv-1377 (D. Md.)—and request that the newly filed related cases be stayed pending the Court’s decision on Plaintiffs’ Motion.

Date: June 24, 2025

Respectfully Submitted,

/s/ Nicholas A. Migliaccio

Nicholas A. Migliaccio

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Counsel for Plaintiff Henry

**Pro Hac Vice* forthcoming